

EXHIBIT ii

Correspondence Re Plaintiff's Discovery
Responses



Shirley LaVarco <shirley@civilrightscorps.org>

Discovery Issues

Shirley LaVarco <shirley@civilrightscorps.org>

Thu, Jan 11, 2024 at 6:56 PM

To: Celena Vinson <cvinson@thompsonhorton.com>

Cc: Kathryn Vestal <KVestal@thompsonhorton.com>, Linda Price <lprice@thompsonhorton.com>, Jeff Stein <jeff@civilrightscorps.org>, Cassidy Kristal-Cohen <cassidy@civilrightscorps.org>, Brittany Francis <brittany@civilrightscorps.org>

Dear Counsel,

Please see attached for Plaintiff's response to your January 3 letter. You should receive a link to download Plaintiff's supplemental productions shortly, via Everlaw. We hope that this letter will remedy your concerns in full. But should you have any further questions or concerns, we are happy to discuss them by phone or email.

Best,
Shirley

Shirley LaVarco | Attorney

she/her/hers

(202) 932-1270

Civil Rights Corps

1601 Connecticut Avenue NW, Suite 800

Washington, D.C. 20009

Admitted to practice in the District of Columbia.

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On Wed, Jan 10, 2024 at 4:57 PM Celena Vinson <cvinson@thompsonhorton.com> wrote:

Shirley,

You do not need to send us documents that we produced in our production.

Thanks,

Celena

From: Shirley LaVarco <shirley@civilrightscorps.org>

Sent: Wednesday, January 10, 2024 3:44 PM

To: Celena Vinson <cvinson@thompsonhorton.com>; Kathryn Vestal <KVestal@thompsonhorton.com>; Linda Price <lprice@thompsonhorton.com>

Cc: Jeff Stein <jeff@civilrightscorps.org>; Cassidy Kristal-Cohen <cassidy@civilrightscorps.org>; Brittany Francis <brittany@civilrightscorps.org>

Subject: Re: Discovery Issues

Dear Counsel,

We expect to have complete responses to the concerns raised in your January 3 letter no later than January 12. We will produce records from third parties to which Defendants have equal or superior access to (e.g., Harris County Animal Control Reports). But could you please clarify whether you are also requesting Plaintiff's copies of documents that Defendants have already produced in discovery (e.g., Defendants' incident reports and footage from their body-worn cameras)? Creating that sort of duplicative production would waste time and resources, and unnecessarily inflate the cost of litigating this case.

Best,
Shirley

Shirley LaVarco | Attorney

she/her/hers

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On Thu, Jan 4, 2024 at 2:32 PM Shirley LaVarco <shirley@civilrightscorps.org> wrote:

Dear Counsel,

I realized belatedly that Brittany was not copied on this email. Please copy her on future communications.

Best,
Shirley

Shirley LaVarco | Attorney

she/her/hers

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On Thu, Jan 4, 2024 at 2:29 PM Shirley LaVarco <shirley@civilrightscorps.org> wrote:

Dear Counsel,

We are in receipt of your letter and will respond as soon as possible.

Best,

Shirley

Shirley LaVarco | Attorney

she/her/hers

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On Wed, Jan 3, 2024 at 12:03 PM Celena Vinson <cvinson@thompsonhorton.com> wrote:

Dear Counsel,

Please see the attached letter regarding your deficient discovery responses.

We look forward to your response.

Celena Vinson, Counsel
3200 Southwest Freeway, Suite 2000
Houston, Texas 77027
T: 713.554.6742
cvinson@thompsonhorton.com | www.thompsonhorton.com



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 **2024.01.11 Pl's Response to Defs' Jan. 3 Deficiency Ltr.pdf**
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